

Polek, Jim

From: Johnson, Kathleen
Sent: Wednesday, December 10, 2014 4:12 PM
To: Greenberg, Ken
Cc: Manzanilla, Enrique; Strauss, Alexis
Subject: FW: Ventura County Waste Water Issues

Thank you Ken.

Kathleen H. Johnson
Director, Enforcement Division
U.S. EPA - Region 9
75 Hawthorne Street ENF-1
San Francisco, CA 94015
415/972-3873
johnson.kathleen@epa.gov

From: Greenberg, Ken
Sent: Wednesday, December 10, 2014 3:12 PM
To: Johnson, Kathleen; TROMBADORE, CLAIRE
Cc: Miller, Amy; Polek, Jim
Subject: RE: Ventura County Waste Water Issues

Yes, I'll take care of this. I'll schedule a meeting between the Superfund on-scene-coordinators, Enforcement Division (me and Jim Polek), Water Division and ORC to discuss next steps. I will also check in again with the Regional Board. We can recommend next steps after this initial meeting and check-in with RB.

At this point, the facility is still not operating as cleanup operations continue. We don't know if the facility will resume operations after the cleanup. At any rate, we plan to do a pretreatment/RCRA inspection when we can access the site. We are already aware of some pretreatment violations that occurred before the explosion. Don't know about RCRA violations. There is also an ongoing criminal investigation (County lead with EPA assistance), so we'll need to watch that we don't step on that.

Ken Greenberg, Manager
Wastewater Section (ENF-3-1)
Enforcement Division
EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
415-972-3577
Greenberg.ken@epa.gov

From: Johnson, Kathleen
Sent: Wednesday, December 10, 2014 8:44 AM
To: Greenberg, Ken; TROMBADORE, CLAIRE
Cc: Miller, Amy
Subject: FW: Ventura County Waste Water Issues

Amy, thanks for responding. Ken, can you take the lead on this – can we put together a recommendation on next steps here?

Kathleen H. Johnson
Director, Enforcement Division
U.S. EPA - Region 9
75 Hawthorne Street ENF-1
San Francisco, CA 94015
415/972-3873
johnson.kathleen@epa.gov

From: Miller, Amy
Sent: Tuesday, December 09, 2014 4:34 PM
To: Strauss, Alexis; Quast, Sylvia; Johnson, Kathleen; Diamond, Jane
Cc: Green, Jay-M; Keener, Bill
Subject: Re: Ventura County Waste Water Issues

Alexis- we do have a wastewater and RCRA inspector (Jim Polek) looking into this matter. Kathleen does not have her blackberry today but will get back to you all tomorrow.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

From: Strauss, Alexis
Sent: Tuesday, December 9, 2014 3:36 PM
To: Quast, Sylvia; Johnson, Kathleen; Miller, Amy; Diamond, Jane
Cc: Green, Jay-M; Keener, Bill
Subject: Ventura County Waste Water Issues

This seems problematic. I suggest we get together to strategize re next steps. Jane or Kathleen, would either of you want to take the lead for us, including involving the LA Regional Water Board?
It would be useful for us to understand how the State sees the compliance status of these two facilities, whose waste now goes there...and where else would it go if these didn't operate long-term.

From: Dunkelman, Tom
Sent: Tuesday, December 09, 2014 3:26 PM
To: Greenberg, Ken; Allen, HarryL; Manzanilla, Enrique; Strauss, Alexis
Cc: Waldon, MARGARET; Powell, Martin
Subject: Ventura County Waste Water Issues

Today I attended a meeting of the Ventura County Supervisors. The focus of the meeting had less to do with the current emergency response at the Santa Clara Waste Water facility, and more to do with the current and future status of the only two commercial wastewater treatment facilities in the County – Santa Clara and Anterra (which does underground injection). My only involvement in the meeting was to briefly respond to a question from one of the Supervisors regarding EPA involvement in the permitting and regulation of these facilities. I responded that the Superfund Emergency Response program was not involved in regulatory issues pertaining to these facilities, but would pass the question on.

There was a fairly sizeable audience and this seems likely to be a significant issue that would involve EPA in the future. Here is a quick summary of the issue.

The Santa Clara Waste Water facility had a fire and explosion three weeks ago, and has been shut down ever since, while the cleanup is ongoing. The facility faces very significant hurdles before (if?) it is allowed to re-open. These hurdles

include an ongoing criminal investigation by the Ventura County DA. There is a 14 mile pipeline that extends from the Santa Clara facility to the City of Oxnard wastewater treatment plant. There have been at least two significant rad exceedances in the discharge from Santa Clara to the Oxnard plant, and consequently Oxnard is no longer accepting treated waste water from Santa Clara. There are also significant H₂S issues in the wastewater coming from Santa Clara. The City of Oxnard only receives about \$350,000 per year from Santa Clara, and it seems likely they may decide against allowing Santa Clara to discharge water to them in the future. This would appear to put the future of the Santa Clara Waste Water facility in question.

The only other commercial wastewater treatment facility in the County is the Anterra facility. This facility receives a much smaller range of waste streams (typically only oily water and brine from small oil producers). With the recent fire and explosion at Santa Clara, there is a lot of focus on the Anterra facility as well. During the meeting, there were many concerns raised regarding the safety of having a facility of this type in close proximity to schools and residences in Oxnard. EJ issues were also raised. There were an equal number of comments from the audience (primarily industry types), regarding the need to have this type of facility in the County and the associated jobs. With Santa Clara being closed, the Anterra facility has been allowed to receive a greater number of truckloads per day (44 – up from the permitted number of 24). This exemption ends on Saturday. The Anterra facility is also up for a new permit in the next two years or so.

I am not sure to what degree EPA is involved in the permitting and regulation of these two facilities, but I am sure there will be additional questions and issues forthcoming. These issues seem to be heightened by the concern that some of the wastewater coming to both of these facilities may be related to fracking.